INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

February 16, 2004

TO: Interested Parties / Applicant

RE: Midwestern Gas Transmission Company / T125-17565-00004

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).
For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:
(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and

(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 9/16/03

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www.IN.gov/idem

PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Midwestern Gas Transmission Company
State Road 56 East
Cato, Indiana 47598

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T125-17565-00004	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 16, 2004 Expiration Date:February 16, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates operates a stationary natural gas pipeline compressor station, identified as the Station 2110 (Cato, Indiana).

Responsible Official:	Vice President
Source Address:	State Road 56 East, Cato, Indiana 47598
Mailing Address:	13710 FNB Parkway, Omaha, Nebraska 68154
General Source Phone Number:	(812) 354-6620
SIC Code:	4922
County Location:	Pike
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Three (3) Clark TLA-8 2700 horsepower (HP) natural gas fired 2-cycle lean burn reciprocating internal combustion engines, identified as 1-A, 2-A, and 3-A, each with a maximum heat input capacity of 19.98 million British thermal units per hour (MMBtu/hr), using no equipment as control, and exhausting to stacks 1-ENG-1A, 2-ENG-2A, and 3-ENG-3A, respectively, and each installed in 1961.

(b) One (1) natural gas fired turbine powered compressor, identified as 1-C, with a maximum capacity of 3540 HP, exhausting to stack 5-CT-1C, and installed in 1980.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including one (1) natural gas fired boiler, rated at maximum heat input rate of 4.0 MMBtu/hr. [326 IAC 6-2-3]

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including one (1) cold cleaning parts washer installed in 1985. [326 IAC 8-3-2]

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Telephone No.: 812-436-2570 (Southwest Regional Office)
Facsimile No.: 812-436-2572

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new

requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, , upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, , any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V

Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, , if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on May 31, 1996.

(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current

Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of

the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the

Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Part 2 MACT Application Submittal Requirement

C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 Maximum Available Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Three (3) Clark TLA-8 2700 horsepower (HP) natural gas fired 2-cycle lean burn reciprocating internal combustion engines, identified as 1-A, 2-A, and 3-A, each with a maximum heat input capacity of 19.98 million British thermal units per hour (MMBtu/hr), using no equipment as control, and exhausting to stacks 1-ENG-1A, 2-ENG-2A, and 3-ENG-3A, respectively, and each installed in 1961.

(b) One (1) natural gas fired turbine powered compressor, identified as 1-C, with a maximum capacity of 3540 HP, exhausting to stack 5-CT-1C, and installed in 1980.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the one (1) combustion turbine (1-C) described in this section except when otherwise specified in 40 CFR Part 60, Subpart GG.

D.1.2 New Source Performance Standard (NSPS) [326 IAC 12-1][40 CFR Part 60, Subpart GG]

(a) The one (1) combustion turbine (1-C) is subject to 40 CFR Part 60, Subpart GG because the heat input at peak load is equal to or greater than 10.7 gigajoules per hour, based on the lower heating value of the fuel fired. However, since combustion turbine 1-C was constructed before October 3, 1982, section 60.332(e) of 326 IAC 12, 40 CFR 60.330, Subpart GG exempts combustion turbine 1-C from the NOx limitations of section 60.332, paragraph (a).

(b) Pursuant to 40 CFR 60.333, the Permittee shall limit sulfur dioxide emissions to 0.015 percent by volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight.

Compliance Determination Requirements

There are no compliance determination requirements specifically applicable to these facilities.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.3 Sulfur Content Monitoring [40 CFR 60.334] [326 IAC 12]

As required by 40 CFR 60.334(b)(2), the sulfur content of the fuel being fired shall be monitored based on the custom fuel monitoring schedule approved by USEPA and IDEM, OAQ.

On July 19, 1995, the Midwestern Gas Transmission Company was issued an alternative monitoring and custom schedule approval for 40 CFR 60, Subpart GG by the USEPA. Pursuant to this EPA approval, the Permittee shall comply with the following conditions.

(a) Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2).

(b) Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.

(c) If after the monitoring required in item (b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calender year.

(d) Should any sulfur analysis as required in items (b) or (c) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify IDEM, OAQ of such excess emissions and the custom schedule shall be re-examined by the USEPA. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

(e) If there is a change in fuel supply, the owner or operator must notify IDEM, OAQ of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.2(b) and D.1.3, the Permittee shall maintain records of sample analysis and fuel supply pertinent to the custom fuel monitoring schedule in Condition D.1.3. The records shall be kept for three (3) years.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. Records taken to demonstrate compliance with emission limitations and standards specified in Section D shall be available to IDEM, OAQ, within 30 days of the end of each compliance period.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

The following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including one (1) natural gas fired boiler, rated at maximum heat input rate of 4.0 MMBtu/hr.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including one (1) cold cleaning parts washer installed in 1985.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating), the PM emitted from the natural gas fired boiler, constructed before 1972 shall be limited to 0.80 lbs of PM per MMBtu.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Midwestern Gas Transmission Company
Source Address: State Road 56 East, Cato, Indiana 47598
Mailing Address: 13710 FNB Parkway, Omaha, Nebraska 68154
Part 70 Permit No.: T125-17565-00004

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) _____

? Report (specify) _____

? Notification (specify) _____

? Affidavit (specify) _____

? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Midwestern Gas Transmission Company
Source Address: State Road 56 East, Cato, Indiana 47598
Mailing Address: 13710 FNB Parkway, Omaha, Nebraska 68154
Part 70 Permit No.: T125-17565-00004

This form consists of 2 pages **Page 1 of 2**

? This is an emergency as defined in 326 IAC 2-7-1(12)
- ? The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- ? The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Midwestern Gas Transmission Company
Source Address: State Road 56 East, Cato, Indiana 47598
Mailing Address: 13710 FNB Parkway, Omaha, Nebraska 68154
Part 70 Permit No.: T125-17565-00004

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Midwestern Gas Transmission Company
Source Location:	State Road 56 E., Cato, Indiana 47598
County:	Pike
SIC Code:	4922
Operation Permit No.:	T125-17565-00004
Permit Reviewer:	Adeel Yousuf / EVP

On November 21, 2003, the Office of Air Quality (OAQ) had a notice published in the Press-Dispatch in Petersburg, Indiana, stating that Midwestern Gas Transmission Company had applied for a Part 70 Operating Permit Renewal for the operation of stationary natural gas pipeline compressor station. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit Renewal for this operation and provided information on how the public could review the proposed Part 70 Operating Permit Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit Renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit renewal. Bolded language has been added and the language with a line through it has been deleted.

1. Conditions C.8, C.13 and C.18 have been updated to change “source” to “Permittee”.

C.8 Performance Testing [326 IAC 3-6]

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC2-1.1-1(1).

2. Condition C.20 has been revised to define MACT as 'Maximum Available Control Technology'.

C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 **Maximum Available Control Technology (**MACT**)** Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Midwestern Gas Transmission Company
Source Location:	State Road 56 E., Cato, Indiana 47598
County:	Pike
SIC Code:	4922
Operation Permit No.:	T125-17565-00004
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit renewal application from Midwestern Gas Transmission Company relating to the operation of a stationary natural gas pipeline compressor station, identified as the Station 2110 (Cato, Indiana). Midwestern Gas Transmission Company was issued Part 70 Permit No. T125-5976-00004 for the Cato Station on December 31, 1998.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Three (3) Clark TLA-8 2700 horsepower (HP) natural gas fired 2-cycle lean burn reciprocating internal combustion engines, identified as 1-A, 2-A, and 3-A, each with a maximum heat input capacity of 19.98 million British thermal units per hour (MMBtu/hr), using no equipment as control, and exhausting to stacks 1-ENG-1A, 2-ENG-2A, and 3-ENG-3A, respectively, and each installed in 1961.

(b) One (1) natural gas fired turbine powered compressor, identified as 1-C, with a maximum capacity of 3540 HP, exhausting to stack 5-CT-1C, and installed in 1980.

Permitted Emission Units and Pollution Control Equipment Removed from the Source

The following previously permitted emission units and pollution control devices that have been removed from service and are not included in this renewal approval:

(a) One (1) natural gas fired turbine powered compressor, identified as 1-B, with a maximum capacity of 1100 HP, exhausting to stack 4-CT-1B, and installed in 1979.

(b) One (1) natural gas fired simple cycle turbine, identified as emergency turbine, with a maximum capacity of 5500 HP.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including one (1) natural gas fired boiler, rated at maximum heat input rate of 4.0 MMBtu/hr. [326 IAC 6-2-3]

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including one (1) cold cleaning parts washer installed in 1985. [326 IAC 8-3-2]

(c) Emergency generators as follows:

Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower, including one (1) Waukesha F1197GU 275 HP natural gas fired 4-cylinder lean burn reciprocating internal combustion engine, identified as 1-D, with a maximum heat input capacity of 1.80 MMBtu/hr.

(d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(e) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(g) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions for those activities would not be associated with any production process.

(h) Other categories with emissions below insignificant thresholds (i.e. less than 3 pounds per hour VOC).

(1) Three (3) hydraulic storage tanks identified as #1, #2 and #3, each with a maximum storage capacity of 140 gallons (each installed in 1960).
(2) One (1) lube oil reservoir identified as #4, with a maximum storage capacity of 1,000 gallons (installed in 1960).
(3) One (1) used oil recips identified as #5, with a maximum storage capacity of 150 gallons (installed in 1960).

(4) One (1) turbine oil storage tank identified as #6, with a maximum storage capacity of 300 gallons (installed in 1980).
(5) One (1) used oil storage tank identified as #10, with a maximum storage capacity of 1,000 gallons (installed in 1990).

(6) One (1) lube oil storage tank identified as #12, with a maximum storage capacity of 8,000 gallons (constructed in 1995).
(7) One (1) pipeline condensate storage tank identified as #13, with a maximum storage capacity of 1,000 gallons (constructed in 1995).
(8) One (1) glycol storage tank identified as #14, with a maximum storage capacity of 8,200 gallons (constructed in 1995).
(9) Gas operated pockets.
(10) Charging orifice plates.
(11) Compressor purge (case vents).
(12) Compressor valve cap leakage.
(13) Compressor rod packing leakage.
(14) Leakage from valves, flanges, fittings, and compressor seals.
(15) Gas powered turbine assist.
(16) Gas assisted starter vents.
(17) Manual relief valves.
(18) Gas operated pumps, control valves, and panal board devices.
(19) Facility laboratory, and/or gas sampling and chromatography.
(20) Dead weight testing.
(21) On-line dew point analyzers.
(22) Meter testing
(23) Meter tube inspections
(24) Air movers.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

(a) Title V Operating Permit No. 125-5976-00004, issued on December 31, 1998.

(b) First Significant Permit Modification No. 125-11685-00004, issued on April 18, 2000.

(c) First Administrative Amendment No. 125-14616-00004, issued on July 27, 2001.

(d) First Reopening No. 125-13447-00004, issued on January 24, 2002.

(e) Second Administrative Amendment No. 125-17293-00004, issued on April 1, 2002.

(f) Third Administrative Amendment No. 125-17293-00004, issued on March 18, 2003.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

(a) Conditions D.1.1 and D.2.1:
General Operation: Any change or modification which may increase potential emissions from the equipment covered in this permit shall obtain prior approval from the Office of Air Quality (OAQ).

Reason not incorporated:
Conditions D.1.1 and D.2.1 are redundant. This requirement is stated in Condition B.21 (Source Modification Requirement).

(b) Section D.4
One (1) natural gas fueled simple cycle turbine, identified as the emergency turbine, with a maximum capacity of 5500 HP.

Reason not incorporated:
Emergency turbine is no longer in operation at the source and has been removed.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on March 31, 2003. Additional information was received on September 4, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (six (6) pages).

Unrestricted Potential to Emit

This table reflects the unrestricted potential to emit of the source, excluding any emission limits that were contained in the previous Part 70 permit.

Pollutant	Unrestricted Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	less than 100
CO	greater than 250
NO_x	greater than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Formaldehyde	greater than 10
Acrolein	less than 10
Acetaldehyde	less than 10
Methanol	less than 10

Benzene	less than 10
Others	less than 10
TOTAL	less than 25

(a) The unrestricted potential emissions of CO and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM-10	0.0
SO_2	0.0
VOC	1.0
CO	5.0
NO_x	25.0

Potential to Emit After Issuance

The source was issued a Part 70 Operating Permit on December 31, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Part 70 Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Total HAPs
Three (3) RICEs [(1)] (1-A, 2-A, and 3-A)	10.08	12.68	0.15	31.50	285.49	1431.35	14.49 [(2)]	20.98
Combustion Turbine (1-C)	1.77	1.77	0.91	0.07	28.37	87.51	0.19	0.34
Natural gas combustion as an insignificant activity [(3)]	0.08	0.33	0.03	0.29	3.82	6.22	0.078	0.11
Insignificant activities [(4)]	--	--	--	16.05	--	--	0.07	0.017
Total Emissions	11.9	14.8	1.1	47.9	317.7	1525.1	14.49 [(2)]	21.4

1. Reciprocating internal combustion engine (RICE).
2. As formaldehyde, which is the only single HAP emitted at greater than 10 tons per year, based on the potential to emit calculations of Appendix A.
3. Includes one (1) natural gas fired boiler and 275 HP emergency generator RICE.
4. Insignificant activities consist of fugitive VOC emissions from Equipment Leaks, VOC emissions associated with Reciprocating Engines and Turbine Operation. Other emission sources include Process Controllers, Doghouse, Recip Blowdowns, Pigging and ESD.

County Attainment Status

The source is located in Pike County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Pike County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Pike County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) One (1) boiler (B-001) constructed in 1986 and rated at 4.0 MMBtu per hour is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because the boiler's capacity is less than the rule applicability threshold of 10 MMBtu per

hour.

(b) This source is not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60.1630, Subpart KKK) or (40 CFR 60.1630, Subpart LLL) because this source is not defined as an "offshore natural gas processing plant." Natural gas liquids are not extracted from field gas and there is no fractionation of mixed natural gas liquids.

(c) The one (1) natural gas combustion turbine (1-C) is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.330 through 60.335, Subpart GG) because the heat input at peak load is equal to or greater than 10.7 gigajoules per hour, based on the lower heating value of the fuel fired and the turbine was installed after the rule applicability date of October 3, 1977. However, since combustion turbine 1-C was constructed before October 3, 1982, section 60.332(e) of 326 IAC 12, 40 CFR 60.330, Subpart GG exempts combustion turbine 1-C from the NOx limitations of section 60.332, paragraph (a). Pursuant to 40 CFR 60.333, the permittee shall limit sulfur dioxide emissions to 0.015 percent by volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight. Pursuant to 40 CFR 60.334(b), the permittee shall monitor the fuel delivered to the station on a periodic basis to document the sulfur and nitrogen content of the fuel being fired in the turbine. Since the combustion turbine (1-C) is supplied its fuel without intermediate bulk storage, the permittee may develop a custom schedule for determining fuel sulfur and nitrogen content. Also, permittee shall report periods of excess emissions, as required by 40 CFR 334(c).

(d) The one (1) natural gas fired emergency generator (1-D) is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.330 through 60.335, Subpart GG) because this unit is a 4-cylinder lean burn reciprocating internal combustion engine and not a combustion turbine.

(e) The storage tanks and vessels (#1through #6, #10 and #12 through #14), as insignificant activities, are still not subject to the requirements of 326 IAC 12, (40 CFR Parts 60.110, 110a - 115a or 110b - 117b, as Subparts K, Ka, and Kb, respectively), since the biggest tank has a storage capacity of 8,200 gallons, below the minimum applicable threshold to the three rules of 40 cubic meters (10,568 gallons).

(f) The parts degreasing operation at this source, consisting of one (1) cold cleaning parts wash tank with a capacity less than 145 gallons, as an insignificant activity, is still not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR Part 63.460 through 63.469, Subpart T). Subpart T applies to degreasing operations that use one of six listed halogenated solvents, or any combination of those solvents, in a concentration greater than 5 percent by weight, as a cleaning or drying agent. This source uses the cleaning solvent which does not contain the regulated halogenated solvents in the degreasing operation at or above the applicable threshold; therefore, Subpart T does not apply.

(g) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) From Natural Gas Transmission and Storage Facilities, (40 CFR Part 63.1270 through 63.1287, Subpart HHH), because this source does not contain any glycol dehydration units. A facility that does not contain a glycol dehydration unit is not subject to the requirements of Subpart HHH.

(h) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source, because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

(1) This rule requires the source to:

(A) Submit a Part 1 MACT Application by May 15, 2002; and

(B) Submit a Part 2 MACT Application for each affected source category in accordance with the appropriate Part 2 MACT Application deadline listed in Table 1 to 40 CFR 63, Subpart B for the affected source category.

(2) The Permittee submitted a Part 1 MACT Application on May 6, 2002.

(3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ, and OES, receive the initial notification, any of the following will occur:

(A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ, or OES, will notify the source that IDEM, OAQ, or OES, will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

(B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

(C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

(i) 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Stationary Reciprocating

Internal Combustion Engines)

The United States Environmental Protection Agency (EPA) has established the *Stationary Reciprocating Internal Combustion Engines* source category as requiring hazardous air pollutant control. The EPA proposed such requirements on December 19, 2002. As proposed, this rule will be applicable to existing, new, and reconstructed stationary reciprocating internal combustion engines (RICEs) operated at a major source of hazardous air pollutants (HAPs), as defined at 40 CFR Part 63.2.

This source is a major source of HAPs and is subject to the rule as proposed. The source shall evaluate rule applicability upon final promulgation and will comply with all applicable requirements.

(j) The one (1) natural gas fired combustion turbine (1-C) is not subject to the requirements of the National Emission Standards for Hazardous Pollutants (NESHAPs) for Stationary Combustion Engines, 326 IAC 20, (40 CFR Part 63.6080 through 63.6175, Subpart YYYY) because pursuant to 40 CFR 63.6090(b)(4) this rule does not apply to existing combustion turbines as of January 14, 2003. Combustion turbine (1-C) was constructed in 1980 and therefore, is not subject to the requirements of Subpart YYYY.

(k) This source is not subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source.

This source does not contain any units that require the use of a control device to achieve compliance with the representative emission limitations. Therefore, 40 CFR 64 is not applicable to any facilities at the source.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on May 31, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

Pursuant to 326 IAC 2-2 (PSD), this source is a major stationary source because the potential to emit of NOx and CO is greater than 250 tons per year. However, the source did not go through PSD review because it was initially constructed in 1961. The CO and NOx emissions from the two modifications taking place in 1979 and 1980 were less than 250 tons per year, respectively. Combustion turbine 1-B was installed on November 4, 1979 and combustion turbine 1-C was installed on April 1, 1980. Therefore, both turbines predate the PSD major modification threshold limit of 40 tons per year for NOx established on August 7, 1980. Also, this source is not one of the 28 listed source categories and the modification done in 1996 involving the addition of the emergency turbine was also not major with NOx emissions not exceeding 40 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) do not apply to this source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of NO_x and CO. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The

annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source does not have potential fugitive particulate matter emissions of 25 tons per year or more. Therefore, the requirements of 326 IAC 6-5 are not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source is not subject to this rule. This rule applies to major sources of hazardous air pollutants (HAP) that were constructed or reconstructed after July 27, 1997. All the facilities at this source were constructed before 1997, therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability - Individual Facilities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

326 IAC 6-2 does not apply to the internal combustion engines at this source since these facilities are not used for purposes of indirect heating.

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) natural gas fired boiler (constructed before 1983), rated at 4.0 mmBtu/hr, is subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, particulate emissions from indirect heating facilities constructed prior to September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m^3
Pt = emission rate limit (lbs/mmBtu)
Q = total source heat input capacity (mmBtu/hr)
N = number of stacks
a = plume rise factor (0.67)
h = stack height in feet. If a number of stacks of different heights exist, average

stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^{N} H_i \times pa_i \times Q}{\sum_{i=1}^{N} pa_i \times Q}$$

where: Pa = the actual controlled emissions rate in lb/mmBtu using the emission factor form AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

Q = 4.0 mmBtu/hr
Pt = $(50*0.67*35)/(76.5*4.0^{75}*1^{0.25})$ = 5.41 lbs PM/mmBtu

However, per 326 IAC 6-2-3(d), Pt for indirect heating facilities constructed before 1972 shall not exceed 0.8 lbs PM/mmBtu, therefore the boiler is limited to 0.8 lbs PM/mmBtu.

compliance calculation:
Potential PM emissions = 1.9 lb PM/mmCF * (1/1000) (mmCF/mmBtu) = 0.0019 lbs PM/mmBtu.

Potential PM emissions for the boiler (0.0019 lbs PM/mmBtu) are less than the allowable 0.8 lbs PM/mmBtu, therefore the boiler will comply with the requirements of 326 IAC 6-2-3.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

This rule does not apply to the RICEs at this source because gaseous fuels and combustion air are not considered process weight as defined pursuant to 326 IAC 1-2-59 ("Process Weight; Weight Rate" Defined).

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

This source is not subject to 326 IAC 7-1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each facility is less than twenty-five (25) tons per year.

326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to 326 IAC 8-1-6, new facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons or more per year, and which are not otherwise regulated by another provision of Article 8, are subject to the rule requirements. Potential VOC emissions from each RICE and one (1) combustion turbine are less than 25 tons per year. Therefore the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6 (General Reduction Requirements) are not applicable to the source.

326 IAC 8-3-2 (Cold Cleaner Operations)

The source, which is located in Pike County and maintains one (1) cold cleaning parts wash tanks with a capacity less than 145 gallons (i.e., insignificant activities), is subject to the applicable rule requirements since the cleaner, installed in 1985, was installed after January 1, 1980. As such, pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cold cleaning operations are not subject to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control). This rule applies to cold cleaner type degreasing facilities constructed after July 1, 1990. The cold cleaning operations at this source were constructed prior to 1990, therefore, 326 IAC 8-3-5 does not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is located in Pike County and has potential VOC emissions of less than 100 tons per year. Therefore, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Pike County. Therefore, this rule is not applicable to this source.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirement of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. Since this source is located in Pike County, this rule does not apply.

326 IAC 9 (Carbon Monoxide Emission Limits):

Pursuant to 326 IAC 9 (Carbon Monoxide Emission Limits), the source is not subject to this rule since this source commenced operation prior to the rule applicability date of March 21, 1972.

326 IAC 10 (Nitrogen Oxide Rules)

(a) 326 IAC 10-1 (NOx Control in Clark and Floyd Counties)

Pursuant to 326 IAC 10-1-1 (Applicability), the requirements of this rule apply to stationary sources located in Clark and Floyd Counties that emit or have the potential to emit NOx at 100 tons per year or more. The source is located in Pike County and, therefore, this rule is not applicable to this source.

(b) 326 IAC 10-3 (NOx Reduction Program for Specific Source Categories)
Pursuant to 326 IAC 10-3-1 (Applicability), the requirements of this rule apply to any of the specifically listed source categories. This source is not one of the specifically listed sources and, therefore, this rule is not applicable to this source.

(c) 326 IAC 10-4 (NOx Budget Trading Program)
Pursuant to 326 IAC 10-4-1 (Applicability), the requirements of this rule apply to electricity generating units (EGUs) and large affected units, as respectively defined at Sections 2 (16) and (27) of the rule. Based on these definitions, the RICEs and combustion tubine at this source are not considered as an EGU or a large affected unit and therefore, the requirements of this rule do not apply to this source.

Testing Requirements

IDEM may require compliance testing at any specific time to determine if the source is in compliance with an applicable limit or standard. There are presently no emission limits or standards applicable to the compressor engines at this source, and therefore no emissions testing is required in this Part 70 permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

On July 19, 1995, the Midwestern Gas Transmission Company was issued an alternative monitoring and custom schedule approval for 40 CFR 60, Subpart GG by the USEPA. Pursuant to this EPA approval, the Permittee shall comply with the following conditions.

(a) Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an

approved alternative method. The reference methods are: ASTM D1072-80; ASTM D3031-81; ASTM D3246-81; and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2).

(b) Effective the date of this custom schedule, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.

(c) If after the monitoring required in item (b) above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calender year.

(d) Should any sulfur analysis as required in items (b) or (c) above indicate noncompliance with 40 CFR 60.333, the owner or operator shall notify IDEM, OAQ of such excess emissions and the custom schedule shall be re-examined by the USEPA. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

(e) If there is a change in fuel supply, the owner or operator must notify IDEM, OAQ of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

These monitoring conditions are necessary because the turbines must operate properly to ensure compliance with 40 CFR 60, Subpart GG, and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this natural gas pipeline compressor station shall be subject to the conditions of the attached proposed Part 70 Permit No. T125-17565-00004.

Appendix A: Emission Calculations

Company Name: Midwestern Gas Transmission Company (Station 2110)
Address City IN Zip: State Road 56 East, Cato, Indiana 47598
Permit No. : 125-17565-00004
Reviewer: Adeel Yousuf / EVP
Date: August 20, 2003

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity					
Pollutant	NG Fired Internal Combustion Engines	NG Fired Combustion Turbine	NG Fired units Insignificant	Emergency Generator Insignificant	Insignificant Activities *	**TOTAL**
PM	10.08	1.77	0.08	0.00	0.00	11.93
PM10	12.68	1.77	0.33	0.00	0.00	14.79
SO2	0.15	0.91	0.03	0.00	0.00	1.10
NOx	1,431.35	87.51	4.38	1.84	0.00	1525.08
VOC	31.50	0.07	0.24	0.05	16.05	47.92
CO	285.49	28.37	3.68	0.14	0.00	317.68
total HAPs	20.98	0.34	0.08	0.03	0.17	21.43
worst case single HAP	(Formaldehyde) 14.49	(Formaldehyde) 0.19	(Hexane) 0.078	(Formaldehyde) 0.023	(Benzene) 0.07	(Formaldehyde) 14.703

Total emissions based on rated capacity at 8,760 hours/year.

* Insignificant activities consist of fugitive VOC emissions from Equipment Leaks, VOC emissions associated with Reciprocating Engines and Turbine Operation. Other emission sources include Process Controllers, Doghouse, Recip Blowdowns, Pigging and ESD. Fugitive emissions are provided by the source and have been validated to be correct.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity					
Pollutant	NG Fired Internal Combustion Engines	NG Fired Combustion Turbine	NG Fired units Insignificant	Emergency Generator Insignificant	Insignificant Activities *	**TOTAL**
PM	10.08	1.77	0.08	0.00	0.00	11.93
PM10	12.68	1.77	0.33	0.00	0.00	14.79
SO2	0.15	0.91	0.03	0.00	0.00	1.10
NOx	1,431.35	87.51	4.38	1.84	0.00	1525.08
VOC	31.50	0.07	0.24	0.05	16.05	47.92
CO	285.49	28.37	3.68	0.14	0.00	317.68
total HAPs	20.98	0.34	0.08	0.03	0.17	21.60
worst case single HAP	(Formaldehyde) 14.49	(Formaldehyde) 0.19	(Hexane) 0.078	(Formaldehyde) 0.023	(Benzene) 0.07	(Formaldehyde) 14.703

Total emissions based on rated capacity at 8,760 hours/year.

* Insignificant activities consist of fugitive VOC emissions from Equipment Leaks, VOC emissions associated with Reciprocating Engines and Turbine Operation. Other emission sources include Process Controllers, Doghouse, Recip Blowdowns, Pigging and ESD. Fugitive emissions are provided by the source and have been validated to be correct.

Appendix A: Emission Calculations
Internal Combustion Engines - Natural Gas
> 600 HP
Reciprocating

Company Name: Midwestern Gas Transmission Company (Station 2110)
Address City IN Zip: State Road 56 East, Cato, Indiana 47598
Permit No.: 125-17565-00004
Reviewer: Adeel Yousuf / EVP
Date: August 20, 2003

A. Three (3) Clark TLA-8 2-cycle lean burn reciprocating engines, identified as 1-A, 2-A, 3-A.

Max Engine Capacity: 2700 horsepower
19.98 MMBtu/hr

Total Number of Engines: 3

Hours of Operation: 8760 hour/year

	Emission Factors		Total per Engine		Total for 3 Engines	
Pollutant	AP-42 Factor	Stack Test	lb/hr	ton/yr	lb/hr	ton/yr
	lb/10^6 Btu	gr/bhp-hr				
PM **	3.84E-02	n/a	0.7672	3.3605	2.3017	10.081
PM10 **	4.83E-02	n/a	0.965234	4.2277	2.8957	12.683
SO2	5.88E-04	n/a	0.0117	0.0515	0.0352	0.154
NOx *	n/a	18.3	108.9310	477.1177	326.7929	1431.353
VOC	1.2E-01	n/a	2.3976	10.5015	7.1928	31.504
CO *	n/a	3.65	21.7267	95.1628	65.1800	285.488
HAPs	AP-42 Factor		lb/hr	ton/yr	lb/hr	ton/yr
	lb/10^6 Btu					
Acenaphtene	1.33E-06		0.00003	0.00012	0.00008	0.00035
Acenaphthylene	3.17E-06		0.00006	0.00028	0.00019	0.00083
Acetaldehyde	7.76E-03		0.15504	0.67910	0.46513	2.03729
Acrolein	7.78E-03		0.15544	0.68085	0.46633	2.04254
Anthracene	7.18E-07		0.00001	0.00006	0.00004	0.00019
Benzene	1.94E-03		0.03876	0.16977	0.11628	0.50932
Benzo(a)anthracene	3.36E-07		0.00001	0.00003	0.00002	0.00009
Benzo(a)pyrene	5.7E-09		0.00000	0.00000	0.00000	0.00000
Benzo(b)fluoranthene	8.51E-09		0.00000	0.00000	0.00000	0.00000
Benzo(e)pyrene	2.34E-08		0.00000	0.00000	0.00000	0.00001
Benzo(g,h,I)perylene	2.48E-08		0.00000	0.00000	0.00000	0.00001
Benzo(k)fluoranthene	4.26E-09		0.00000	0.00000	0.00000	0.00000
Biphenyl	3.95E-06		0.00008	0.00035	0.00024	0.00104
1,3-Butadiene	8.20E-04		0.01638	0.07176	0.04915	0.21528
Carbon Tetrachloride	6.07E-05		0.00121	0.00531	0.00364	0.01594
Chlorobenzene	4.44E-05		0.00089	0.00389	0.00266	0.01166
Chloroform	4.71E-05		0.00094	0.00412	0.00282	0.01237
Chrysene	6.72E-07		0.00001	0.00006	0.00004	0.00018
1,3-Dichloropropene	4.38E-04		0.00875	0.03833	0.02625	0.11499
Ethylbenzene	1.08E-04		0.00216	0.00945	0.00647	0.02835
Ethylene Dibromide	7.34E-05		0.00147	0.00642	0.00440	0.01927
Fluoranthene	3.61E-07		0.00001	0.00003	0.00002	0.00009
Fluorene	1.69E-06		0.00003	0.00015	0.00010	0.00044
Formaldehyde	5.52E-02		1.10290	4.83068	3.30869	14.49205
Indeno(1,2,3-c,d)pyrene	9.93E-09		0.00000	0.00000	0.00000	0.00000
Methanol	2.48E-03		0.04955	0.21703	0.14865	0.65109
Methylene Chloride	1.47E-04		0.00294	0.01286	0.00881	0.03859
2-Methylnaphthalene	2.14E-05		0.00043	0.00187	0.00128	0.00562
n-Hexane	4.45E-04		0.00889	0.03894	0.02667	0.11683
Napthalene	9.63E-05		0.00192	0.00843	0.00577	0.02528
Phenol	4.21E-05		0.00084	0.00368	0.00252	0.01105
PAH	1.34E-04		0.00268	0.01173	0.00803	0.03518
Perylene	4.97E-09		0.00000	0.00000	0.00000	0.00000
Phenanthrene	3.53E-06		0.00007	0.00031	0.00021	0.00093
Pyrene	5.84E-07		0.00001	0.00005	0.00004	0.00015
Styrene	5.48E-05		0.00109	0.00480	0.00328	0.01439
Toluene	9.63E-04		0.01924	0.08427	0.05772	0.25282
1,1,2,2-Tetrachloroethane	6.63E-05		0.00132	0.00580	0.00397	0.01741
1,1,2-Trichloroethane	5.27E-05		0.00105	0.00461	0.00316	0.01384
2,2,4-Trimethylpentane	8.46E-04		0.01690	0.07404	0.05071	0.22211
Vinyl Chloride	2.47E-05		0.00049	0.00216	0.00148	0.00648
Xylene	2.68E-04		0.00535	0.02345	0.01606	0.07036
		Total	1.6E+00	6.99	4.79	20.98

Methodology

* NOx and CO emission factors are carried over from the original Title V permit (T125-5976-00004) which are based on stack test performed in 1995 on a similar type of reciprocating engine
VOC, HAP, PM, PM10, and SO2 emission factors are from AP 42, Chapter 3.2, Table 3.2-1 (2-Stroke Lean-Burn Engines) (SUPPL. F, 7/2000).
** PM emission factor is filterable PM10 only. PM10 emission factor is filterable PM10 and condensable PM combined.
Potential Througput (hp-hr/yr) = hp * 8760 hr/yr
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)
Emission (tons/yr) = [Potential Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

Appendix A: Emission Calculations
Natural Gas Fired Stationary Gas Turbines

Company Name: Midwestern Gas Transmission Company (Station 2110)
Address City IN Zip: State Road 56 East, Cato, Indiana 47598
Permit No.: 125-17565-00004
Reviewer: Adeel Yousuf / EVP
Date: August 20, 2003

B. One (1) natural gas fired combustion turbine, identified as 1-C.

Max Engine Capacity: 3540 horsepower
61.2 MMBtu/hr

Hours of Operation: 8760 hour/year

	Emission Factors		Total per Engine	
Pollutant	AP-42 Factor	Stack Test	lb/hr	ton/yr
	lb/10^6 Btu	gr/bhp-hr		
PM	6.60E-03	n/a	0.4039	1.7692
PM10	6.60E-03	n/a	0.4039	1.7692
SO2 **	3.40E-03	n/a	0.2081	0.9114
NOx	n/a	2.56	19.9793	87.5092
VOC	2.1E-03	n/a	0.0164	0.0718
CO	n/a	0.83	6.4777	28.3721
HAPs	AP-42 Factor		lb/hr	ton/yr
	lb/10^6			
Acetaldehyde	4.00E-05		0.00245	0.01072
Acrolein	6.40E-06		0.00039	0.00172
Benzene	1.20E-05		0.00073	0.00322
Benzo(a)anthracene	3.00E-06		0.00018	0.00080
1,3-Butadiene	4.30E-07		0.00003	0.00012
Cadmium	6.92E-06		0.00042	0.00185
Chromium	1.32E-05		0.00081	0.00354
Copper	6.92E-06		0.00042	0.00185
Ethylbenzene	3.20E-05		0.00196	0.00858
Fluoranthene	1.20E-06		0.00007	0.00032
Formaldehyde	7.10E-04		0.04345	0.19032
Manganese	8.02E-05		0.00491	0.02150
Mercury	6.63E-06		0.00041	0.00178
Naphthalene	1.30E-06		0.00008	0.00035
Nickel	1.15E-04		0.00704	0.03083
Phenol	1.27E-05		0.00078	0.00340
PAH	2.20E-06		0.00013	0.00059
Propylene Oxide	2.90E-05		0.00177	0.00777
Toluene	1.30E-04		0.00796	0.03485
Xylene	6.40E-05		0.00392	0.01716
		Total	0.08	0.34

Methodology

* NOx and CO emission factors are carried over from the original Title V permit (T125-5976-00004) which are based on stack test performed in 1995 on a similar type of combustion turbine
VOC, PM, PM10, and SO2 emission factors are from AP 42, Chapter 3.2, Tables 3.2-1 (2-Stroke Lean-Burn Engines) (SUPPL. F, 7/2000).
** SO2 emission factor is based on default value as per Table 3.1-2a (footnote h) (April 2000).
HAPs emission factors are based on EPA FIRE Database (Version 6.23)
PM equals PM10. Total PM consists of PM condensible and PM filterable.
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)
Emission (tons/yr) = [Potential Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

Appendix A: Emission Calculations
Internal Combustion Engines - Natural Gas
Turbine (>250 and <600 HP)
Reciprocating

Company Name: **Midwestern Gas Transmission Company (Station 2110)**
Address City IN Zip: **State Road 56 East, Cato, Indiana 47598**
Permit No.: **125-17565-00004**
Reviewer: **Adeel Yousuf / EVP**
Date: **August 20, 2003**

C. One Waukesha F1197GU 4-cylinder lean burn emergency generator engine, identified as 1-D.

Max Engine Capacity: 275 horsepower
1.8 MMBtu/hr

Limited Hours of Operation: 500 hours per year

Emission Factors

Pollutant	AP-42 Factor		lb/hr	ton/yr
	lb/10^6 Btu			
PM	7.71E-05	n/a	0.0001	0.0000
PM10	9.99E-03	n/a	0.0180	0.0045
SO2	5.88E-04	n/a	0.0011	0.0003
NOx	4.08	n/a	7.3440	1.8360
VOC	1.18E-01	n/a	0.2124	0.0531
CO	3.17E-01	n/a	0.5706	0.1427
HAPs	AP-42 Factor		lb/hr	ton/yr
	lb/10^6			
2,2,4-Trimethylpentane	2.5E-04		0.00045	0.00011
Acetaldehyde	8.36E-03		0.01505	0.00376
Acrolien	5.14E-03		0.00925	0.00231
Benzene	4.40E-04		0.00079	0.00020
Ethylbenzene	3.97E-05		0.00007	0.00002
Formaldehyde	5.28E-02		0.09504	0.02376
Methanol	2.50E-03		0.00450	0.00113
Methylene Chloride	2.0E-05		0.00004	0.00001
n-Hexane	1.11E-03		0.00200	0.00050
Naphthalene	7.44E-05		0.00013	0.00003
Toluene	4.08E-04		0.00073	0.00018
Vinyl Chloride	1.49E-05		0.00003	0.00001
Xylenes	1.84E-04		0.00033	0.00008
		Total	0.13	0.03

Methodology

All the emission factors are based on AP-42 (Uncontrolled Emission Factors for 4-Stroke Lean Burn Engines), Table 3.2-1 (July 2000).
PM emission factor is filterable PM10 only. PM10 emission factor is filterable PM10 and condensable PM combined.
Potential Througput (hp-hr/yr) = hp * 8760 hr/yr
Emission Factors are from AP42 (7/00), Table 3.3-2
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)
Emission (tons/yr) = [Potential Throughput (hp) x Emission Factor (g/hp-hr)] x (1 lb/453.54 g) * 8760 hr/yr / (2,000 lb/ton)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Midwestern Gas Transmission Company (Station 2110)**
Address City IN Zip: **State Road 56 East, Cato, Indiana 47598**
Permit No.: **125-17565-00004**
Reviewer: **Adeel Yousuf / EVP**
Date: **August 20, 2003**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.0	87.6

One (1) natural gas fired boiler, rated at maximum heat input capacity of 4.0 MMBtu/hr.
Five (5) natural gas fired space heater, each rated at 1.0 MMBtu/hr (assuming worst case)
One (1) natural gas fired furnace, rated at 1.0 MMBtu/hr

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.33	0.03	4.38	0.24	3.68

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 6 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions
Company Name: Midwestern Gas Transmission Company (Station 2110)
Address City IN Zip: State Road 56 East, Cato, Indiana 47598
Permit No. : 125-17565-00004
Reviewer: Adeel Yousuf / EVP
Date: August 20, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.198E-05	5.256E-05	3.285E-03	7.884E-02	1.489E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.190E-05	4.818E-05	6.132E-05	1.664E-05	9.198E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.